

REMARKS

Main claim 36 is restricted, among other things, to “communication via [] one or more nodes [] in the form of packets; wherein the one or more nodes comprise routers and wherein communication via the one or more routers uses internet protocol (IP)”. This is not found in the cited reference of Cheeseman. The interfaces SPM of Cheeseman are described neither as routers, nor as passing data in Internet Protocol form.

The communication via the nodes of the present invention is in the form of IP packets. These nodes are fundamentally different from the interfaces SPM of Cheeseman. Cheeseman describes (col. 5, lines 20-30) the interfaces SPM as providing communication between ATM, where data is carried in cells not packets, and TDM where data is carried in frames not packets. The cells of ATM and the frames of TDM have distinct structures and would be well known to the skilled worker. These structures are distinct from the structure of IP packets required by the present invention.

Furthermore, the structural differences are functional in that the structure of each of these data formats is directed to the way the data is handled in the relevant ATM, TDM or IP network. ATM cells are designed to be switched along a predetermined path or circuit. The skilled worker would find such paths identified in Cheeseman (see reference to SVCs at col. 5, lines 58-64).

IP packets are designed to be routed, not switched. The difference here is that routed packets do not follow a predetermined path but are directed along the path deemed “best” by the router at the time that it decides to send that packet. The route chosen for a particular packet may be different from that chosen for previous and subsequent packets. The skilled worker would appreciate these differences in structure and function and would find no teaching in Cheeseman directed to routing of packets.

The Examiner states that the interfaces SPM of Cheeseman are routers because they "convert traffic cells and transfer said cells to the ATM network i.e. devices performing function of router such as interconnecting two networks".

The Examiner's definition of routers is not recognized. Routers do not process ATM cells. The function of a router is not to convert traffic between two different networks/formats. Routers are not interfaces between networks: they are nodes embedded within an IP network receiving and emitting data in the same form: i.e., IP packets and dealing exclusively with IP communications. Cheeseman describes, at col. 5, lines 58-64, the interfaces SPM as having an ATM address. Routers are not designed to process the ATM protocol and do not have an ATM address. It is pointed out that, according to the present invention, conversion (i.e., between STM and IP domains) is carried out by a separate adapter, not by the nodes.

Given the clear distinction between ATM and IP technologies, as indicated above and familiar to the skilled worker in the field of communications, it is contended that the present invention is clearly distinguished from the teaching of the reference.

In addition, the main claim 36 now includes the subject matter of canceled claim 29, namely the adapter operative for converting the traffic from a packetized form to a non-packetized form. This clearly is not disclosed in, or suggested by, the prior art.

Wherefore, a favorable action is earnestly solicited.

Respectfully submitted,

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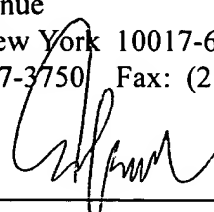
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